

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

INSTITUTIONAL INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-1-7)
(August 26, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following institutional interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Boldt (APWU/USPS-T1-1-5), filed on August 15, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-1 Page 8 of the Request, lines 6-7 states “Insufficient customer demand also serves as a factor that could lead to a feasibility study, as would the availability of alternate access channels.” Please define “insufficient customer demand.”

APWU/USPS-2 Refer to Library Reference USPS-LR-N2011-1/1, Page 14 Section 243 provides that after the deadline for customer feedback has expired, “the Discontinuance Coordinator timely prepares a questionnaire analysis.” Please describe fully this analysis.

APWU/USPS-3 Refer to Library Reference USPS-LR-N2011-1/1, Page 21 Section 321.1 states that the “proposal should include information about distance to nearby retail facilities,” will this distance information be provided as driving distances or the distance “as a crow flies.”

APWU/USPS-4 What percentage transactions occurring at locations that are being studied are strictly stamp sales, with no other activities taking place during the visit? Is it possible to tell if a transaction has taken place in conjunction with someone visiting their PO box?

APWU/USPS-5 In USPS-T-1 Witness Boldt states that there is no dollar goal associated with the RAO Initiative and the Request provides only broad generalized statements about the RAO goals (see page 4 of the Request).

- a) How will the Postal Service evaluate whether it has reached its goals?
- b) Does the Postal Service intend to close every location on this list unless it finds an overwhelming reason not to do so?
- c) If complete closure of all locations is not the goal, what factors will be used to determine that the RAO Initiative and related closings have gone “far enough?”

APWU/USPS-6 The Station and Branch Optimization and Consolidation Initiative (SBOC) that was the subject of Docket No. N2009-1 generated a list of about 3,300 stations and branches that were to be evaluated for closure (see USPS-LR-N2009-1/19, filed on December 1, 2009). After a screening process, that list was reduced to 162 locations listed on January 29, 2010 (USPS-LR-N2009-1/4).

- a) Have all of the 162 locations provided in the January 29, 2010 list now been closed? If not, what is their status?
- b) How many of the 3,300 stations and branches that were on the SBOC December 1, 2009 list are also included in Library Reference USPS-LR-N2011-1/3 submitted for this case?

- c) For the facilities on both lists, what factors have caused these locations to be re-examined under the RAO initiative?
- d) The criteria used to choose the list for the RAO initiative seems significantly different from the criteria used to choose the list for the SBOC initiative. Has the SBOC criteria been abandoned? What factors caused the Postal Service to change its focus to the RAO criteria?

APWU/USPS-7 In its Advisory Opinion in Docket No. N2009-1, the Commission made several recommendations.

- a) Item 9 of the Commission's recommendations suggested that the Postal Service conduct evaluations of the efficiency gains achieved and the impact on the ready access to postal services that resulted from its SBOC closings. Has the Postal Service conducted these evaluations? If so, what did those evaluations show and how did the results inform the current RAO process?
- b) In item 3 of its recommendations, the Commission expressed its concern about how, when and by whom the special community factors would be evaluated in the process.
 - i) What changes have been made in the process to accommodate a better evaluation of special community factors?
 - ii) Who will have the responsibility for that part of the evaluation?